Taiwan Network Information Center (TWNIC)

25 July 2011

Fiona M. Alexander,
Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

RE: Further Notice of Inquiry on the Internet Assigned Numbers Authority Functions

About the Taiwan Network Information Center

The Taiwan Network Information Center (TWNIC) is a non-profit organization that takes charge of the .tw/. 台灣 domain name registration and IP address allocation in Taiwan. The primary functions and responsibilities of TWNIC are (1) providing Internet services, including domain name and IP/ASN registration and management, as well as directory and database access; in addition, promoting Internet business in Taiwan in a spirit of non-profit, mutual and impartial sharing of network resources; (2) Coordinating and facilitating activities and cooperation between national and international Internet-related organizations; and (3) Assisting the industry in the promotion of nationwide Internet use, and coordinating the exchange and integration of Internet information services.

Comments

TWNIC welcomes the opportunity to provide comments in response to the Further Notice of Inquiry (FNOI) issued by the National Telecommunications and Information Administration (NTIA) regarding its contract with the Internet Corporation for Assigned Names and Numbers (ICANN) for certain Internet Assigned Numbers Authority (IANA) functions (the IANA Functions Contract).

TWNIC would like to echo some earlier comments that full automation is an automatic, secure, and authenticated process that allows root zone changes to be made directly by the Registry Managers. IANA process should be neutral, open and transparent. IANA should take the every Internet community's best interest into consideration. When establishing and implementing any specific process, IANA should recognize and defer to the practice, operation, and status of each registry (ccTLD) manager, as well as any feedback from each registry (ccTLD) manager and the community that such sponsoring organization represents. No process or mechanism should be implemented by IANA without addressing the specific needs of each registry (ccTLD) manager and the community.

Bests,

Ai-Chin Lu Vice CFO

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